

Greenhagen, Andrew

From: Nalin Gupta <NGupta@wvresc.com>
Sent: Saturday, February 15, 2020 12:00 PM
To: Greenhagen, Andrew
Cc: Jeffrey R. McDonald
Subject: Re: CCS Class VI Permit

Andrew –

Would you be able to share “EPA’s Financial Responsibility Cost Estimation Tool” with us? I found the following paragraph describing the tool.

“The Financial Responsibility Cost Estimation Tool : The EPA’s Cost Estimation Tool for Class VI Financial Responsibility Demonstrations is designed to provide an “acceptable range of costs” for GS financial responsibility activities based on information submitted with a permit application. The spreadsheet-based tool requests inputs about the proposed site, e.g., well depth, planned duration of the project and PISC timeframe, and size of the AoR. Based on this, it generates a range of cost estimates for required activities, e.g., corrective action, injection well plugging, PISC and site closure and emergency and remedial response. The cost estimates for each activity are intended to be accurate enough for UIC Programs to assess whether the financial responsibility cost estimates in the permit application are likely to be adequate, and can guide discussions between the UIC Program and the applicant during the permit application review process.”

Thanks,
Nalin

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